

EXHIBIT E

From: Jennifer Dorminey Herzog jherzog@hallboothsmith.com
Subject: Coffee County Response to Bruce Brown re: Curling - Chaney Subpoena
Date: April 14, 2023 at 4:36 PM
To: Bruce Brown bbrown@brucepbrownlaw.com
Cc: Marilyn Marks [REDACTED] marilyn@uscgg.org, Cross, David D. DCross@mofo.com, Conaway, Jenna B. JConaway@mofo.com, Cary Ichter Cichter@lichterDavis.com, Anthony A. Rowell ARowell@hallboothsmith.com, Stephen Delk SDelk@hallboothsmith.com, Vickers, Wesley Wesley.Vickers@coffeecounty-ga.gov, Vickers, Tracie Tracie.Vickers@coffeecounty-ga.gov



Mr. Brown,

I am writing in response to your attached letter. As counsel for Coffee County and the Coffee County Board of Elections, our firm no longer represents Mr. Chaney. Therefore, you should direct your request directly to Mr. Chaney and his current counsel. We request a copy of any documents produced by Mr. Chaney be also produced to our office.

As counsel for Coffee County and the Coffee County Board of Elections, we have reviewed your correspondence and the attached exhibits and believe the core premise of your email is inaccurate – nothing of Ms. Brown's 5.2.22 email referenced appears responsive to any of the paragraphs referenced in your communications. Likewise, we are unaware of any further documents that were generated after the email referenced.

Lastly, and as I am sure you are well aware, a significantly lengthy time has passed since the issuance of and response to the referenced subpoena, and it further appears based on the attached documents that discovery in the case referenced has long expired. If you would like to submit an Open Records Request to Coffee County, Ms. Marks can advise as to the appropriate process for directing any requests to the Coffee County Records Custodian.

Sincerely,

Jennifer Herzog

Jennifer Dorminey Herzog

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From: Bruce Brown <bbrown@brucepbrownlaw.com>
Sent: Thursday, April 13, 2023 2:32 PM

To: Jennifer Dorminey Herzog <jnerzog@hallboothsmith.com>; Anthony A. Rowell <ARowell@hallboothsmith.com>; Stephen Delk <SDelk@hallboothsmith.com>
Cc: Marilyn Marks (Marilyn@USCGG.org) <marilyn@uscgg.org>; Cross, David D. <DCross@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; Cary Ichter <CIchter@IchterDavis.com>
Subject: Curling - Chaney Subpoena

Ms. Herzog, Mr. Rowell and Mr. Delk –

Please see the attached letter.

Thanks,

Bruce

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